

## REMARKS

Allowance of the above captioned application in view of the newly drafted claims is respectfully requested.

In the Office Action dated November 8, 2005, independent claim 1 as previously pending was rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 4,930,711 to Morizzo in view of U.S. Patent No. 5,437,417 to Kammann. By this amendment, all previously pending claims have been canceled and replaced by new claims 71-101, including independent claims 71 and 88. Applicants submit that the newly drafted claims patentably define over Morizzo either alone or in combination with Kammann.

Independent claim 71 is directed to a winder for winding a web to produce a rolled product, while independent claim 88 is directed to a process for unwinding a parent roll into multiple product rolls. In independent claim 71, the winder includes a web transport apparatus comprising a conveyor belt and a plurality of winding modules positioned along the web transport apparatus. Each winding module includes a mandrel and a positioning apparatus. As stated in claim 71, the positioning apparatus is configured to move the mandrel into and out of engagement with the conveyor belt. In this manner, when the mandrel is placed in engagement with the conveyor belt, a nip is formed between the mandrel and the conveyor belt. As described in the present application, the nip between the mandrel and the conveyor belt is used to contact a web being conveyed on the conveyor belt in order to initiate winding of the web on the mandrel. As also described in the application, the winder is particularly well suited to winding a web on the mandrel with a core or without a core.

Similar to claim 71, process claim 88 requires the step of positioning a mandrel adjacent to a conveyor belt for forming a nip and thereafter conveying a leading edge of a tissue web into the nip so as to initiate winding of the web onto the mandrel.

The winder disclosed in claim 71 and the process disclosed in claim 88 both patentably define over Morizzo either alone or in combination with Kammann. Morizzo is directed to an assembly for removing a section of a fabric that may be defective as the fabric is unwound. As stated in the abstract, the apparatus removes the defective section

and then positions the lengths preceding and following the removed section in overlapping relationship with one another so that the overlapped lengths can be wound into a roll.

As shown in the figure contained in Morizzo, a fabric sheet 10 is unwound and conveyed on a belt 38. From the belt 38, the fabric is then adhered to a roller 58 by a vacuum source. The winding roller 58 in conjunction with a winding roller 62 in turn rotate a supporting roll 22 for winding the textile material onto the supporting roll.

Once the textile sheet has been fully wound onto the supporting roll 22, a cylinder 72 is then activated that lifts a support assembly subframe 75 for ejecting the fully wound roll onto a transport assembly 56.

In stark contrast to the currently pending claims, however, Morizzo does not disclose or suggest a positioning apparatus that is configured to move a mandrel into contact with a conveyor belt so that a nip is formed between the mandrel and the conveyor belt. Instead, as described above, the supporting roll 22 upon which the material in Morizzo is wound is always maintained elevated above the conveyor belt 38 by the winding rollers 58 and 62.

Further, it would not have been obvious to somehow modify Morizzo so that the supporting roll 22 forms a nip with the conveyor belt 38. **To do so would make the apparatus disclosed in Morizzo completely inoperable.** For example, if the supporting roller 22 was placed in contact with the conveyor belt 38 to form a nip in order to engage the material, it is unclear as to even how the material would then be wound upon the supporting roll in conjunction with the winding rolls 58 and 62. Further, if the supporting roll 22 were placed adjacent to the conveyor belt 38, the cylinder 72 that is used to eject the fully wound rolls would no longer operate for its intended purpose. If the supporting roll 22 were placed against the conveyor belt to form a nip, for instance, when the cylinder 72 is activated the fully wound roll would no longer be ejected onto the transport assembly 56. Thus, the currently pending claims patentably define over Morizzo either alone or in combination with Kammann.

In fact, Kammann does nothing to cure the above noted deficiencies of the base reference. Similar to Morizzo, for instance, Kammann nowhere discloses or suggests moving a mandrel in contact with a conveyor belt so as to form a nip in order to initiate winding of a web on the mandrel.

In addition to the above, Applicants submit that various features and aspects of the dependent claims are also completely absent from the proposed cited references. For instance, in claims 75, 76, 98 and 99, the conveyor belt comprises either a vacuum belt or an electrostatic belt that is configured to hold a web adjacent to a surface of the conveyor belt. In comparison, Morizzo does disclose a vacuum plate 44. The vacuum plate 44, however, **operates completely opposite to the vacuum belt or electrostatic belt as defined in claims 75, 76, 98 and 99**. In particular, the vacuum plate 44 is intended to raise the material above the conveyor belt 38 as opposed to holding the material onto a surface of the conveyor belt.

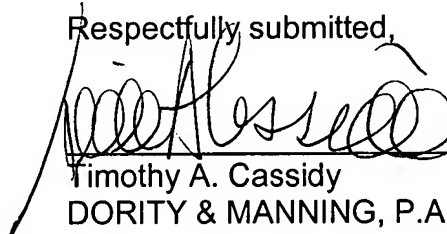
In summary, Applicants submit that the presently pending claims are in complete condition for allowance. Should any issues remain after consideration of this response, then Examiner Haugland is invited and encouraged to telephone the undersigned at his convenience.

Please charge any additional fees required by this Amendment to Deposit Account No. 04-1403.

March 8, 2006

Date

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Timothy A. Cassidy", is written over a horizontal line.

Timothy A. Cassidy

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